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Local Counsel for Salvacion, USA, Inc., Salvacion Co., LTD., Yeong Wan Cho (aka Peter Cho), Salvacion R&D Center, Salvacion International, LLC, Sei Young Yun, Biosure Global, Ltd.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Trutek Corp.,

Plaintiff,

-vs-

Civil Action No.: 2:23-cv-3709

Yeong Wan Cho (a.k.a Peter Cho);
Abdul Gaffar; Sei Young Yun; Salvacion
USA, Inc.; Salvacion International,
LLC; Salvacion Co., Ltd.; Salvacion
R&D Center; Biosure Global, Ltd.;
Immobilier La Salvacion, R.D., John
and Jane Does 1 through 10 (gender
neutral fictitious names); ABC
Corporation 1 through 10 (fictitious
names),

Defendants.

**NOTICE OF DEFENDANTS'
MOTION FOR PRO HAC VICE
ADMISSION OF COUNSEL**

Electronically Filed

**RETURN DATE: Date to be set by the
Court**

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, attorney for Defendants Salvacion USA, Inc.; Salvacion International, LLC; Salvacion Co., Ltd.; Salvacion R&D Center; Biosure Global, Ltd; Yeong Wan Cho (a.k.a. Peter Cho); and Sie Young Yun ("Defendants"), shall appear before this Court, U.S.D.J., **Martin Luther King Building & U.S. Courthouse**, 50 Walnut Street, Newark, NJ 07102, and shall move this Court for entry of an Order pursuant to Local Civil Rule 101.1(c) admitting Jeffrey D. Dyess, Esq., member in good standing of the bar of the state of Alabama, as counsel pro hac vice in this matter.

PLEASE TAKE FURTHER NOTICE that in support of their Motion, Defendants shall rely upon the Application and Certification of Thomas J. White, Esq., and Declaration of Jeffrey D. Dyess, Esq. A proposed form of Order is also submitted for the Court's consideration.

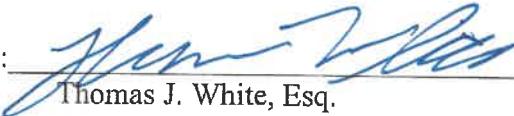
PLEASE TAKE FURTHER NOTICE that Defendants hereby requests that their application be considered for a ruling on papers only and counsel for Defendants has not previously been admitted pro hac vice by this Court in the present calendar year.

PLEASE TAKE FURTHER NOTICE that all parties consent to the pro hac vice admission.

LADDEY, CLARK & RYAN, LLP

Local Counsel for Defendants, Salvacion, USA, Inc.,
Salvacion Co., LTD., Yeong Wan Cho (aka Peter
Cho), Salvacion R&D Center, Salvacion
International, LLC, Sei Young Yun, Biosure Global,
Ltd.

By:


Thomas J. White, Esq.

STATEMENT IN LIEU OF BRIEF PURSUANT TO L.CIV.R. 7.1(c)(1)

Pursuant to Local Civil Rule 7.1(c)(1), Defendants submit this Statement in lieu of the submission of a formal brief in support of their application for the admission *pro hac vice* of co-counsel. Inasmuch as the admission of counsel *pro hac vice* under the terms of Local Civil Rule 101.1(c) is a matter within the sound discretion of the Court, and because all parties consent to the *pro hac vice* admission, it is respectfully submitted that no brief in support of the within motion is necessary at this time.

Dated: August 31, 2023.

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Local Counsel for Defendants, Salvacion, USA, Inc., Salvacion Co., LTD., Yeong Wan Cho (aka Peter Cho), Salvacion R&D Center, Salvacion International, LLC, Sei Young Yun, Biosure Global, Ltd.

By:


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R&D Center; Biosure Global, Ltd.;
Inmobiliaria La Salvacion, R.D., John
and Jane Does 1 through 10 (gender
neutral fictitious names); ABC
Corporation 1 through 10 (fictitious
names),

Defendants.

Plaintiff,

Civil Action No.: 2:23-cv-3709

CERTIFICATE OF SERVICE

Electronically Filed

Thomas J. White, hereby certifies as follows:

I am an attorney-at-law of the State of New Jersey and Of Counsel of the Law Office of Laddey, Clark & Ryan, LLP, attorney for Defendants in the above matter. I hereby certify that on this 25th day of August 2023, I caused copies of Defendant's Notice of Motion for Admission Pro Hac Vice of Co-Counsel, the Application and Certification of Thomas J. White, Esq. in support thereof, the Declaration of Jeffrey D. Dyess, and a proposed form of an Order to be filed via the Court's CM/ECF electronic filing system.

Dated: August 31, 2023

By:


Thomas J. White, Esq.